

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*¹

Debtors.

Chapter 11

Case No.: 24-11967 (JKS)

(Jointly Administered)

NOTICE OF SUBSTITUTION OF COUNSEL AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that, pursuant to Rule 9010-2(a) & (b) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), Jeffrey M. Carbino, Esquire hereby withdraws his appearance as counsel for Sun Plaza [Shops], LLC (“Sun Plaza”), in the above-captioned cases (the “Cases”), and requests that he be removed from any applicable service lists in the Cases on behalf of Sun Plaza.

PLEASE TAKE FURTHER NOTICE that Leslie C. Heilman, Laurel D. Roglen, and Margaret A. Vesper of Ballard Spahr LLP hereby substitute their appearance as counsel for Sun Plaza in this Case.

PLEASE TAKE FURTHER NOTICE that Sun Plaza pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.*, Rules 2002, 3017, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure, and Local Rule 2002-1(d), and request that copies of all

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

pleadings, motions, notices and other papers filed or served in this bankruptcy case, be served upon Sun Plaza through the undersigned attorneys as follows:

Leslie C. Heilman, Esquire
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Margaret A. Vesper, Esquire
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PLEASE TAKE FURTHER NOTICE, that the foregoing request includes, without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Substitution of Counsel and Request for Notices* nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed or construed to constitute a waiver of any substantive or procedural right of Sun Plaza including, without limitation, (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District Court”), (ii) the right to trial by jury in any proceeding related to these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments

consistent with Article III of the United States Constitution heard by the District Court, or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which Sun Plaza is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: November 19, 2024

Respectfully submitted,

/s/ *Levi Schwartz*

Jeffrey M. Carbino, Esquire *w/ permission of J.M. Carbino*
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Withdrawing Counsel to Sun Plaza, LLC

/s/ *Leslie C. Heilman*

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